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March 17, 2022

**VIA CM/ECF**

The Honorable Lydia Kay Griggsby, U.S.D.J.  
U.S. District Court for the District of Maryland  
101 West Lombard Street  
Chambers 5C  
Baltimore, MD 21201

**Re: *Baltimore County Branch of the National Association for the  
Advancement of Colored People, et al. v. Baltimore County, et al.,  
Civil Action No. 1:21-cv-03232-LKG***

Dear Judge Griggsby:

On behalf of Defendant Baltimore County, Maryland (“Baltimore County”), and pursuant to this Court’s March 11, 2022 Order (ECF No. 62), we write to provide notice that Baltimore County intends to call Dr. James Gimpel and Julian E. Jones, Jr. to testify during the March 21, 2022 hearing.

Dr. James Gimpel is a professor of political science in the Department of Government at the University of Maryland, College Park. He received a Ph.D. in political science at the University of Chicago in 1990. His areas of specialization include political behavior, political geography, geographic information systems (GIS), state politics, population mobility and immigration. He will be testifying that the County’s proposed redistricting map creates an additional County District in which Black voters have an opportunity to elect a representative of their choice, and that Plaintiffs’ proposed map harms candidates of color in District 4 and does not comply with traditional redistricting principles.

Julian E. Jones, Jr. is the current County Council Chairman and Council representative for District 4. He has extensive knowledge of Baltimore County’s legislative process and has connections with many of Maryland’s minority state and local legislators and potential candidates. He will testify to the high likelihood of vetted, qualified, candidates-of-color that will emerge if the Court approves and adopts the new redistricting map.

Baltimore County reserves the right to cross-examine Plaintiffs’ witnesses during the March 21, 2022 hearing.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Ava E. Lias-Booker". The signature is fluid and cursive, with the first name "Ava" being particularly prominent.

Ava E. Lias-Booker (Fed. Bar No. 05022)

Encl.

cc: James R. Benjamin, Jr., Esq.  
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